

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY (CAMDEN)**

Caption in Compliance with D.N.J. LBR 9004-2(c)

STRADLEY RONON STEVENS & YOUNG, LLP
Woodland Falls Corporation Park
200 Lake Drive East, Suite
Cherry Hill, NJ 08002
856-321-2400
Mark J. Dorval, Esquire (MD-3304)
Paul A. Patterson, Esquire (Pro Hac)
Michael J. Cordone, Esquire (Pro Hac)

In Re:

SHAPES/ARCH HOLDING L.L.C., et al

Case No. 08-14631-GMB (Jointly
Administered)

Chapter 11

Judge Gloria M. Burns

Hearing Date: n/a

APPLICATION TO ADMIT PAUL A.
PATTERSON and MICHAEL J.
CORDONE *PRO HAC VICE*

**NOTICE OF APPLICATION OF MARK J. DORVAL, ESQUIRE, FOR AN ORDER
GRANTING *PRO HAC VICE* ADMISSION OF PAUL A. PATTERSON, ESQUIRE AND
MICHAEL J. CORDONE, ESQUIRE,
PURSUANT TO D.N.J. LR 101.1(c) AND D.N.J. LBR 2090-1(b)**

PLEASE TAKE NOTICE that, pursuant to D.N.J. LR 101.1(c) and D.N.J. LBR 2090-1(b), Mark J. Dorval, Esquire, local counsel for The CIT Group/Business Credit, Inc., for itself and as agent, hereby makes this Application before the United States Bankruptcy Court, District of New Jersey, 401 Market Street, Camden, NJ 08101 for the entry of an Order admitting Paul

A. Patterson, Esquire and Michael J. Cordone, Esquire, *pro hac vice* in the above-captioned matter to represent The CIT Group/Business Credit, Inc., for itself and as agent.

The undersigned hereby requests that, in accordance with D.N.J. LBR 2090-1(c), if no objection to the within Application is filed within five (5) days, the Application be granted and the propose form of Order be entered.

/s/ Mark J. Dorval

Mark J. Dorval

Dated: March 31, 2008

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DISTRICT OF NEW JERSEY (CAMDEN)**

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Paul A. Patterson, Esquire (Pro Hac) :
Michael J. Cordone, Esquire (Pro Hac) :

In Re: : Case No. 08-14631-GMB (Jointly
SHAPES/ARCH HOLDINGS, L.L.C., et al. : Administered)
: Chapter 11
: Judge Gloria M. Burns
: Hearing Date: n/a
: APPLICATION TO ADMIT PAUL A.
: PATTERSON and MICHAEL J.
: CORDONE *PRO HAC VICE*
:
:

**APPLICATION OF MARK J. DORVAL, ESQUIRE, FOR AN ORDER GRANTING
PRO HAC VICE ADMISSION OF PAUL A. PATTERSON, ESQUIRE AND MICHAEL J.
CORDONE, ESQUIRE, PURSUANT
TO D.N.J. LR 101.1(c) AND D.N.J. LBR 2090-1(b)**

I, Mark J. Dorval, Esquire, respectfully submit this Application for an Order Granting *Pro Hac Vice* Admission of Paul A. Patterson, Esquire and Michael J. Cordone, Esquire, Pursuant to D.N.J. LR 101.1(c) and D.N.J. LBR 2090-1(b) (the “Application”), and respectfully represents to the Court as follows:

1. I am a partner of the law firm Stradley Ronon Stevens & Young, LLP, which has offices located at 200 Lake Drive East, Suite 100, Cherry Hill, NJ 08002.

2. I am a member in good standing of the bar of the State of New Jersey and bar of the United States District Court and Bankruptcy Court for the District of New Jersey and am not under suspicion or disbarment by any Court.

3. This Application is submitted in support of the admission *pro hac vice* of Paul A. Patterson, Esquire and Michael J. Cordone, Esquire.

4. I respectfully request that Paul A. Patterson, Esquire and Michael J. Cordone, Esquire be admitted for the purposes of representing the interest of The CIT Group/Business Credit, Inc., for itself and as agent, in the above-captioned matter.

5. As indicated in the accompanying Declaration of Paul A. Patterson, Esquire, Mr. Patterson is a member in good standing of the bar of the Commonwealth of Pennsylvania, the United States District Court for the Eastern District of Pennsylvania and the United States Court of Appeals for the Third Circuit.

6. As indicated in the accompanying Declaration of Michael J. Cordone, Esquire, Mr. Cordone is a member in good standing of the bar of the Commonwealth of Pennsylvania, the United States District Court for the Eastern District of Pennsylvania, and the United States District Court for the Middle District of Pennsylvania.

7. Mr. Patterson and Mr. Cordone are well regarded, highly skilled attorneys with extensive experience in the area of bankruptcy law. Both Mr. Patterson and Mr. Cordone are familiar with the circumstances surrounding the Chapter 11 case of Shapes/Arch Holdings, L.L.C. Their admission *pro hac vice* would benefit the administration of these bankruptcy proceedings.

8. I understand that only I, or another member of my firm who is also a member in good standing of the bar of the State of New Jersey and the United States Bankruptcy Court for the District of New Jersey, may file papers, enter appearances for parties, sign stipulations or sign and receive payments on judgments, decrees or orders.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Mark J. Dorval

Mark J. Dorval

Dated: March 31, 2008

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In Re: Case No. 08-14631-GMB(Jointly
SHAPES/ARCH HOLDINGS L.L.C., et al Chapter 11
Judge Gloria M. Burns
Hearing Date: n/a
APPLICATION TO ADMIT PAUL A.
PATTERSON and MICHAEL J.
CORDONE *PRO HAC VICE*

**DECLARATION OF MICHAEL J. CORDONE, ESQUIRE, IN SUPPORT OF *PRO HAC
VICE* ADMISSION, PURSUANT TO D.N.J. LR 101.1(c) AND D.N.J. LBR 2090-1(b)**

I, MICHAEL J. CORDONE, ESQUIRE, declare as follows:

1. I make this Declaration in support of the application for my *pro hac vice* admission to this Court in these bankruptcy proceedings pursuant to D.N.J. LR 101.1(c) and D.N.J. LBR 2090-1(b).
2. I am an attorney and a member in good standing of the Bar of the Commonwealth of Pennsylvania and am admitted to practice in the United States District Court for the Eastern

District of Pennsylvania, the United States District Court for the Middle District of Pennsylvania, and all state courts in the Commonwealth of Pennsylvania.

3. I am a partner with the law firm of Stradley, Ronon, Stevens and Young, LLP, and I maintain an office at 2600 One Commerce Square, Philadelphia, Pennsylvania 19103.

4. I am a member in good standing of each and every bar to which I am admitted. I have never been under suspension or disbarred by any court, State or Federal.

5. I have experience in bankruptcy matters, such as the matter before the Court. I believe my admission *pro hac vice* would benefit my client, The CIT Group/Business Credit, Inc., for itself and as agent, and would aid in the administration of this bankruptcy proceeding.

6. I am familiar with the District of New Jersey Local Bankruptcy Rules and the Local Civil Rules of the United States District Court for the District of New Jersey.

7. I am aware of my obligations pursuant to Rule 101.1(c) of the Local Civil Rules of the United States District Court for the District of New Jersey as made applicable to this Court by the District of New Jersey Local Bankruptcy Rules. If granted *pro hac vice* admission to this Court, I will, to the best of my ability, faithfully comply with all local rules and customs of this Court.

8. I respectfully request that I be granted *pro hac vice* admission in these bankruptcy proceedings because I have served as legal counsel for The CIT Group/Business Credit, Inc., for itself and as agent, and am familiar with the facts of the instant matter.

I declare under penalty of perjury that the foregoing is true and correct.



Michael J. Cordone

Dated: March 31, 2008

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Hearing Date: n/a

APPLICATION TO ADMIT PAUL A.
PATTERSON and MICHAEL J.
CORDONE *PRO HAC VICE*

DECLARATION OF PAUL A. PATTERSON, ESQUIRE, IN SUPPORT OF *PRO HAC VICE* ADMISSION, PURSUANT TO D.N.J. LR 101.1(c) AND D.N.J. LBR 2090-1(b)

I, PAUL A. PATTERSON, ESQUIRE, declare as follows:

1. I make this Declaration in support of the application for my *pro hac vice* admission to this Court in these bankruptcy proceedings pursuant to D.N.J. LR 101.1(c) and D.N.J. LBR 2090-1(b).

2. I am an attorney and a member in good standing of the Bar of the Commonwealth of Pennsylvania and am admitted to practice in the United States District Court for the Eastern

District of Pennsylvania and all state courts in the Commonwealth of Pennsylvania and the United States Court of Appeals for the Third Circuit.

3. I am a partner with the law firm of Stradley, Ronon, Stevens and Young, LLP, and I maintain an office at 2600 One Commerce Square, Philadelphia, Pennsylvania 19103.

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6. I am familiar with the District of New Jersey Local Bankruptcy Rules and the Local Civil Rules of the United States District Court for the District of New Jersey.

7. I am aware of my obligations pursuant to Rule 101.1(c) of the Local Civil Rules of the United States District Court for the District of New Jersey as made applicable to this Court by the District of New Jersey Local Bankruptcy Rules. If granted *pro hac vice* admission to this Court, I will, to the best of my ability, faithfully comply with all local rules and customs of this Court.

8. I respectfully request that I be granted *pro hac vice* admission in these bankruptcy proceedings because I have served as legal counsel for The CIT Group/Business Credit, Inc., for itself and as agent, and am familiar with the facts of the instant matter.

I declare under penalty of perjury that the foregoing is true and correct.

Paul A. Patterson
Paul A. Patterson

Dated: April 3, 2008

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CORDONE *PRO HAC VICE*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Application of Mark J. Dorval, Esquire, for an Order Granting *Pro Hac Vice* Admission of Paul A. Patterson, Esquire and Michael J. Cordone, Esquire, Pursuant to D.N.J. LR 101.1(c) and D.N.J. LBR 2090-1(b) was served e-mail on the date indicated below, upon the following:

Jerrold N. Poslunsny, Jr., Esquire
(jposlusny@cozen.com)

John C. Kilgannon, Esquire
(jck@stevenslee.com)

Joel Shapiro, Esquire
(Shapiro-jc@blankrome.com)

United States Trustee
U.S. Department of Justice
District of New Jersey
One Newark Center, Suite 2100
Newark, NJ 07102
(973) 645-5993 (fax)

/s/ Mark J. Dorval
Mark J. Dorval

Dated: April 3, 2008